

DECLARATION OF GERALD ARMSTRONG

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2
3 I, Gerald Armstrong, declare as follows:

4
5 1. I am making this declaration to correct the errors
6 in the declaration of John Peterson dated October 13, 1986
7 regarding my "mission files" and to support a motion to compel
8 their production.

9
10 2. Mr. Peterson stated in his declaration:

11 "During the trial of Christofferson v. Church of
12 Scientology, Mission of Davis, et al., Multnomah
13 County, Oregon Circuit Court No. A7704-05814,
14 Cross-Defendant Church produced "Mission Files"
15 pertaining to Gerald Armstrong. These "Mission Files",
16 (sic) all of which were dated in the early 1970's,
17 contained documents which did not refer to Armstrong at
18 all, or which referred to Armstrong only in a minor way
19 such as his name on a crew list, and other completely
20 innocuous documents such as newspaper articles and
21 maps. These files were completely irrelevant to, and
22 not admitted into evidence in, the Christofferson trial
23 and are equally irrelevant to the current action."

24
25 3. Mr. Peterson also stated to this Court at a hearing
26 on September 26, 1986:

27 "Now, the three or four boxes that were in Oregon which
28 Plaintiff claims they are -- or defendant that they

1 hadn't seen or what is known as Mission files. Gerry
2 Armstrong was on the ship "Apollo" as it cruised around
3 the Caribbean back in the early seventies. He had a
4 post on the ship, different posts. I think he was what
5 they call a port captain and when the ship would go on
6 a certain cruise to Curacao or Lisbon or wherever the
7 ship went, they kept a file on the trip and it just
8 happened to mention Gerry's name in some of these
9 files, and we were ordered in Oregon to turn over every
10 document that even mentioned Gerry Armstrong. So in
11 these documents it will be like a roster of the crew
12 and it will have port captain Gerry Armstrong."

13
14 4. Attached hereto as Exhibit A are portions of the
15 trial transcript from April 12, and 16, 1985 in the
16 Christofferson case which concern the referenced mission files.
17 There were six files, plaintiff's exhibits No. 257, 258, 259,
18 260, 261 and 264. At Pp. 4968-4974, I identify and describe
19 each of these mission files the organization had produced in
20 Christofferson. I was not just a name on a crew list in these
21 files. I did the missions, was briefed, drilled, sec-checked
22 and "fired" off the ship. I carried out the shore story as an
23 official representative of the Apollo's "Owner." I generated
24 daily reports, telexes, PR reports and evaluations. I returned
25 to the ship, debriefed and was again sec-checked. I was
26 assigned ethics conditions for each mission. In one case,
27 Hubbard assigned me a "condition of confusion," the lowest
28 "condition" he assigned anyone. Each of these mission files

1 concern me directly as I carried out as a Flag Missionaire each
2 of the mission targets, and I created the mission files. These
3 files were, contrary to what Mr. Peterson has stated, admitted
4 into evidence in Christofferson at P. 5254, as illustrative of
5 the type and quantity of documentation generated and preserved
6 by the organization for actions as simple as making arrangements
7 for the "Apollo's" arrival in a "new" port, to contrast them to
8 the organization's representations that it had no documentation
9 relating to the complex, costly and years-long "Armstrong
10 operation" which the organization "broke" with four plus hours
11 of illegally obtained videotapes of me earlier in that trial.
12 The Court noted at the September 26, 1986 hearing that the
13 disagreement between the organization and me regarding its
14 non-compliance with various discovery orders "may become an
15 issue in the trial" of this cross-complaint. I consider the
16 organization's attempts to thwart discovery a very significant
17 issue in this case, and on this issue alone the organization
18 must produce the mission files.

19
20 5. The organization has forged a "defense" to my
21 claims in the cross-complaint that I was a "low level file
22 clerk" who "dreams up" things and who "failed at every job (I)
23 had while in the Church." (See John Peterson declaration of
24 October 20, 1986, attached hereto as Exhibit B.) The "mission
25 files" from Christofferson will show that I did not fail at
26 every job in the organization and was not a low level clerk.
27 They will also show that even these records from missions in the
28 early 1970's to ports in Europe and the Caribbean have been

1 vetted with relevant documents removed in preparation for this
2 litigation.

3
4 6. Attached hereto as Exhibit C is a copy of a sample
5 "crew list," in this instance a list of personnel at the staging
6 area in Daytona Beach, Florida in November 1975. Such a list,
7 aside from the fact it might be in one of my mission files, has
8 no direct connection to the mission purpose or its many
9 targets. Mr. Peterson's testimony that my relationship to the
10 mission files was only my name on a crew list is completely
11 untrue. It is also worth noting that although Mr. Peterson
12 swears at Par. 10 of his declaration of October 20, 1986 that I
13 "was never in the Information Bureau of the Guardian's Office,"
14 I am listed at p. 3 of Exhibit C as Director of Branch I, or
15 Director of Intelligence, in the Guardian's Office.

16
17 7. Attached hereto as Exhibit D is a page from
18 cross-defendant's requests for admissions dated October 2,
19 1985. Request for admission No. 5 reads:

20 "Admit that you participated in a project or 'mission'
21 in October of 1974, in which one of the objects or
22 'targets' was to place disclaimer warnings in
23 Scientology books to the effect that Scientology is an
24 applied is an applied religious philosophy that does
25 not cure medical illnesses."

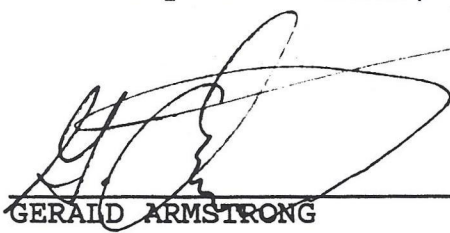
26 This refers to LRH FPO 157, a mission I was on from October 20
27 to 31, 1974. This mission file is not included in what was
28 produced in Christofferson, but is clearly relevant to the

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Executed this
Boston, Massachusetts.

7th

day of November, 1986 at


GERALD ARMSTRONG

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

JULIE CHRISTOFFERSON TITCHBOURNE,)

Plaintiff,)

vs.)

No. A7704-05184

CHURCH OF SCIENTOLOGY, MISSION)

OF DAVIS, a non-profit California)

corporation, doing business in)

Oregon; CHURCH OF SCIENTOLOGY)

OF CALIFORNIA, a California)

corporation, doing business in)

Oregon; and L. RON HUBBARD,)

Defendants.)

EXCERPT OF PROCEEDINGS

Volume X

Pages 4836 to 4975 and 5040 to 5108

Testimony of Gerald D. Armstrong

April 12 and 15, 1985

BILL ELLIS & ASSOCIATES
Court Reporters
1001 S.W. Fifth Ave.
Portland, Oregon

A.

1 MR. WADE: I would like to start with 257.

2 MR. COOLEY: Have these been marked, Your Honor?

3 THE COURT: Yes, they have been marked 257,
4 258, 259, 260 and 261.

5 BY MR. WADE: (Continuing)

6 Q. Mr. Armstrong, could you explain what 259 through 261
7 are.

8 A. 257.

9 Q. Excuse me, 257.

10 A. 257 is the product of a mission which I was on as the
11 mission second, along with John Danilovich as the mission in
12 charge in 1974 when we went from Lisbon, Portugal, to -- first
13 of all Vigo in northern Spain, and then La Coruna, and it
14 contains the mission orders on which we were briefed and
15 fired. And it contains the various actions which we took in
16 securing a ships chandler, ships agent; contacting the port
17 authorities, customs and that sort of thing, in order to pave
18 the way, grease the lines for the arrival of the ship. It was
19 the first time the ship had gone to those ports.

20 We had been in the south of Spain in 1973 and we were
21 running out of ports, because it was quite a hot situation in
22 Portugal at that time, and there was a feeling amongst the
23 locals that we were somehow an intelligence operation. They
24 thought we were the CIA. We were something else.

25 So this contains all of the documents which we

1 acquired along the way. I believe that there is in here is a
2 contract which we signed with the shipping agent -- ships
3 agent, and all the documents which we obtained, and all the
4 correspondence which would be in the form of telexes between
5 our mission and back to the ship. We were in continual daily
6 telex communication to the ship. And also we wrote what are
7 called daily reports. Each day on a mission, you are required
8 to write a daily report of all the activities of that day.
9 Any problems run into and that sort of thing. That's what
10 this is.

11 Q. That's one mission and I think we have marked other
12 mission operations. FMO, what does FMO mean?

13 A. Flag Mission Order?

14 A. Yes.

15 Q. We have numbers on these and there are also codes.
16 Do you have any idea what the codes mean?

17 A. It probably comes from the mission title itself. And
18 it would be included in the telex communication. Code PLP.
19 So if there is any communications in here, then they will have
20 a PLP designation indicating they are from that mission. The
21 reason for that is the ship, wherever the telex machine that
22 the ship was using, they received a telex communications from
23 many countries, all throughout the day, so to keep telexes
24 straight, you put the particular code, the designation for
25 that mission, in the telex.

1 Q. Now, these were all missions that you were involved
2 with?

3 A. Yes. Mission La Provincia --

4 MR. COOLEY: What exhibit is that?

5 THE WITNESS: 259.

6 MR. COOLEY: Could we take them in order.

7 What was 258, Mr. Wade?

8 MR. WADE: 258, FMO 1362, Mission Spanish
9 Ports. We will get to that, soon.

10 BY MR. WADE: (Continuing)

11 Q. Why don't you identify 259 and we will go through
12 first and identify all of them.

13 A. Okay. 259, unless the other documents are here, it
14 appears to be a part of FMO 1396, and this mission had to do
15 the dead agenting of a newspaper in Los Palmos, in the
16 Canaries, and I was in charge of that mission and it had to do
17 with hiring an attorney. But it's only a partial file.

18 Q. What you are saying, not all the file has been
19 presented?

20 A. No. There should be a great deal more than this.
21 The various ports and so on.

22 MR. COOLEY: What's the title of the mission,
23 Your Honor? I didn't hear it.

24 THE WITNESS: Mission La Provincia.

25 BY MR. WADE: (Continuing)

1 Q. Mr. Armstrong, could you take a look at Exhibits 260
2 and 261 and just for the record, in a very summary fashion,
3 identify what they are.

4 A. Hold on a second. These two go together, this is
5 259. This one here is a separate mission, 1402. And this is
6 a separate one again.

7 Q. We should mark these differently, then?

8 A. Yes.

9 Q. I will mark these two separate numbers.

10 A. Number 260 is Flag Mission Order 1407, and I'm the
11 in-charge of this mission and my second was John Danilovich,
12 and this has to do with going to Bermuda and then on to the
13 Bahamas to secure more ports for the ship, which had then been
14 forced to leave the -- leave Europe. We had run into problems
15 on the mainland in northern Spain and then in the Canaries,
16 and then in Madeira, and there was virtually no ports
17 available to us. And the ship was forced to come across the
18 Atlantic to the Caribbean. And I flew ahead with John
19 Danilovich and set up these ports. That's what this mission
20 here is all about.

21 Q. Mr. Armstrong, will you now look at 261.

22 A. 261 is FMO 1427, and this is a mission that I did in
23 -- I think it was November, 1974, and my second was Jim Ward,
24 and this was a mission to Jamaica to, again, find a port into
25 which the ship could go.

1 (Plaintiff's Exhibit 261-B and 261-C
2 marked for identification.)

3 BY MR. WADE: (Continuing)

4 Q We have marked two additional packets. This is
5 261-B and this it 261-C. Would you explain what those are.

6 MR. WADE: Would you do me a favor. Refrain
7 from the Bs and Cs. We have enough problems with
8 the numbers, let alone Bs and Cs.

9 THE WITNESS: Hold on. I think you have 1407
10 in there somewhere else.

11 MR. WADE: Right. Right here.

12 MR. WADE: 261-B will be included in 260,
13 Your Honor.

14 THE COURT: We have a terrible record. Can
15 we forget 261-B in its entirety.

16 MR. WADE: We can forget 261-B.

17 THE COURT: And now it's 260?

18 MR. WADE: It's just part of 260, Your Honor.

19 THE COURT: All right. Now how about that
20 other letter?

21 MR. WADE: What we can do with 261-C, why
22 don't we renumber that the next number and that will
23 become 264, Your Honor.

24 (Plaintiff's Exhibit 264 was
25 marked for identification.)

1 MR. WADE: We offer Exhibits 257 --

2 BY MR. WADE: (Continuing)

3 Q. Before we do that, I would like you to identify
4 Exhibit 258, if you can, Mr. Armstrong.

5 A. 258 is FMO 1362, Mission Spanish Port Setup, and this
6 time it's to El Ferrol. And El Ferrol was a port north of
7 Vigo and La Caruna and we did a mission, John Danilovich and
8 I, to this port, again, to set up the port just after we
9 completed the Vigo and La Caruna mission. This was a failed
10 mission. They did not allow us to come into the port because
11 of our troop, our music troop. And somewhere in here would be
12 an issue from Hubbard, if it hasn't been taken out, which will
13 explain all that. It's not here.

14 Q. Thank you. Take a look at Exhibit 264 and identify
15 that, please.

16 A. 264 is FMO 1402 called Mission Car Services. The
17 in-charge was Burt Rousseau and I was the second. And this
18 had to do with -- I was taking care of the legal steps
19 necessary for the importation of Hubbard's cars into Portugal.
20 It was in September-October 1974. The cars -- I had had them
21 stored in Portugal for probably a year or more prior to that,
22 but he was not able to drive them because they were not
23 imported and so we were taking the necessary steps to legally
24 import them into the country. That was my part of the
25 mission. The other person, Burt Rousseau was, in fact, then

1 on a post called LRH Transport. He was in charge of transport
2 of Hubbard's cars. So he was taking care of the servicing of
3 these vehicles and I was taking care of the legal steps.

4 MR. WADE: Your Honor, we would offer
5 Exhibits 257 through 261 and Exhibit 264.

6 MR. COOLEY: Objection. Beyond the scope of
7 cross. Being offered on an undifferentiated mass
8 basis, the file's are full of individual pieces of
9 of paper, none of which have been examined by the
10 court or by counsel. They would have to be marked
11 individually if they were relevant and otherwise
12 admissible. There must be a thousand pieces of
13 paper up there. And I object on the ground of
14 relevance, lack of foundation and beyond the scope
15 of direct -- cross-examination. And being offered
16 in an improper manner in that it's a big file folder
17 without the individual documents being dealt with.

18 MR. WADE: Your Honor, with respect to the
19 timing, they were not produced until yesterday.

20 THE COURT: I understand that.

21 MR. WADE: It was impossible for us to
22 produce them before. We are offering them for a
23 variety of reasons.

24 THE COURT: Why don't you tell me what it is
25 out of the presence of the jury.

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

JULIE CHRISTOFFERSON TITCHBOURNE,)

Plaintiff,)

vs.)

No. A7704-05184

CHURCH OF SCIENTOLOGY, MISSION)
OF DAVIS, a non-profit California)
corporation, doing business in)
Oregon; CHURCH OF SCIENTOLOGY)
OF CALIFORNIA, a California)
corporation, doing business in)
Oregon; and L. RON HUBBARD,)

Defendants.)

EXCERPT OF PROCEEDINGS

Volume XI

Pages 5109 to 5204 and 5250 to 5306
Testimony of Gerald D. Armstrong

April 16, 1985

BILL ELLIS & ASSOCIATES
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1001 S.W. Fifth Ave.
Portland, Oregon

1 imagine there's any rush on that, so we have to hold
2 up the jury.

3 THE COURT: Okay. Let's set aside some point
4 of time so we can do that. Perhaps one morning
5 earlier we can give ourselves an hour and do that
6 before we start the jury.

7 What is my schedule tomorrow?

8 THE CLERK: I don't have the docket.

9 THE COURT: My idea at the moment is to pick
10 a morning. Meanwhile, 257 through 261 and No. 264
11 are received for illustrative purposes only.

12 MR. COOLEY: Not to go to the jury.

13 THE COURT: Not to go to the jury.

14 Mr. Armstrong.

15 (The witness resumed the witness
16 stand.)

17 THE COURT: I do have something tomorrow.

18 Okay. Get the jury.

19 (Following proceedings held in the
20 presence of the jury.)

21 MR. WADE: Would you please hand Mr.
22 Armstrong the exhibits we discussed during the
23 break.

24 (The court clerk handed exhibits to
25 the witness.)

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JOHN G. PETERSON
PETERSON AND BRYNAN
8530 Wilshire Boulevard, Suite 407
Beverly Hills, California 90211
(213) 659-9965

Attorneys for Plaintiff and Cross-Defendant
CHURCH OF SCIENTOLOGY OF CALIFORNIA

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

CHURCH OF SCIENTOLOGY OF CALIFORNIA,)	No. C 420 153
)	
Plaintiff,)	DECLARATION OF JOHN G. PETERSON IN RESPONSE TO CROSS-COMPLAINANT'S OPPOSITION TO
v.)	MOTION FOR ISSUANCE OF COMMISSIONS TO TAKE DEPOSITION
GERALD ARMSTRONG, et al.,)	OUTSIDE CALIFORNIA AND MOTION FOR ISSUANCE OF LETTERS
Defendants.)	ROGATORY AND IN RESPONSE TO DECLARATION OF GERALD ARMSTRONG
AND RELATED CROSS-ACTION.)	

I, JOHN G. PETERSON, declare as follows:

1. I am an attorney at law licensed to practice before all the Courts of the State of California and counsel of record for Cross-Defendant Church of Scientology of California. The statements made herein are given of my own personal knowledge and, if called as a witness, I can and will testify competently thereto.

2. Armstrong's Opposition to Motion for Issuance of Commissions to Take Depositions Outside California requests that no commission be issued for the deposition of Sara Knowles in Boston, and that the commissions for Ron Wade and Garry McMurry be amended. Armstrong also opposes the issuance of commissions to take the depositions of Robert Armstrong,

B.

1 Leonard Howe and Rodney Antrobus.

2 3. Armstrong asks this Court to entirely deny Cross-
3 Defendant's right to take the depositions of Robert
4 Armstrong, Sarah Knowles, Leonard Howe and Rodney Antrobus.
5 This opposition is improper since Armstrong's only recourse
6 is to move for protective orders under C.C.P. § 2019.

7 The California statutes confer upon litigants the right
8 to depositions in a pending case without prior court order
9 and without a showing of good cause. Greyhound Corp. v.
10 Superior Court (1961) 56 Cal 2nd 355, 388. C.C.P. § 2024
11 directs parties who wish to take out of state depositions to
12 proceed in the manner provided by C.C.P. § 2019.

13 In Snyder v. Superior Court, 9 Cal.App.3d 584, 587,
14 the appellant argued that it was not necessary to seek a
15 protective order under C.C.P. § 2019(b) but that a letter
16 objecting to the deposition was sufficient. The court
17 stated: "Plaintiff's only recourse to prevent defendant
18 from taking her deposition in New York was to move for a
19 protective order under section 2019(b)(1)." (Emphasis added)
20 Since Armstrong has not sought a protective order, the
21 depositions should move forward as noticed. It has always
22 been held that discovery statutes are to be liberally
23 construed in favor of disclosure. Cases clearly hold that
24 the scope of examination should not be limited unless the
25 information is clearly privileged or irrelevant, and inquiry
26 should not be limited to matters relevant only to the precise
27 issues presented by the pleadings. Snyder, supra.

28 It is ironic that Armstrong now complains about

1 Cross-Defendant doing discovery. Armstrong filed an \$80
2 million case and put in issue his mental and physical states.
3 Cross-Defendant has the right to protect itself from this
4 attack on its Church coffers by legitimate discovery from
5 those people who supposedly know and knew Armstrong best --
6 his family. He calls these depositions harassment; I call
7 his meritless case harassment and discovery will show that
8 the only periods of his life that he lived without drugs,
9 crime or deviant, aberrated behavior was while he was in
10 Scientology.

11 4. The stated bases for opposing the deposition of Sara
12 Knowles are that Ms. Knowles is not capable of providing
13 meaningful testimony and that Armstrong knows her only through
14 "his capacity of [sic] an employee of Flynn, Joyce &
15 Sheridan." Although Armstrong here claims employment by Flynn,
16 Flynn's secretary, Lorna Turcotte Doherty, testified earlier
17 this month in deposition that Armstrong was not employed by
18 Flynn but was rather an individual sub-contractor.
19 Armstrong's Opposition admits that Ms. Knowles knows him, and
20 that she knows him in the type of personal and social context
21 which his taking care of her home and personal matters would
22 necessarily entail. Her testimony as to his present
23 abilities and duties is obviously relevant to Armstrong's
24 damages claims. Moreover, in 1980 or 1981, Ms. Knowles
25 telephoned Michael Flynn's office, and left a message "Re: P.
26 Cooper and Scient[ology]. Talked to Jeff White [her financial
27 advisor]. Is interested but wants to review extent of
28 involvement." Flynn manages Ms. Knowles financial matters

1 and, in light of Ms. Knowles' earlier interest in
2 Scientology-related litigation, it is likely that Armstrong
3 has discussed aspects of the current action with her. Any
4 such statements made by Armstrong to Ms. Knowles would be
5 highly relevant. Her deposition should not be denied.

6 5. The Church has no objection to taking Ron Wade's
7 deposition on Saturday, October 25, 1986 rather than on
8 October 23, 1986, as is currently requested in the Motion
9 before this Court. However, the Church is not willing to begin
10 the deposition of Garry McMurry at 2:00 p.m. and conclude it
11 on the same business day, rather than at 10:00 a.m., on
12 October 24, 1986. Armstrong was in Portland, Oregon for
13 approximately four months in the Spring of 1985. He worked
14 closely, on a daily basis with both Wade and McMurry. Arm-
15 strong additionally lived on McMurry's property during his
16 stay in Portland. McMurry's knowledge of Armstrong's
17 emotional and mental state, duties, work performance, train-
18 ing, and capabilities during that time period is highly rele-
19 vant to Armstrong's damages claims against the Church. His
20 testimony cannot be limited in advance to three hours or less.

21 6. Armstrong's Opposition to Motion for Issuance of
22 Letters Rogatory and Commissions to Take Depositions in the
23 Province of British Columbia, Canada requests that this Court
24 not issue letters rogatory and commissions for the depositions
25 of Robert Armstrong, Rodney Antrobus and Leonard Howe.

26 7. The stated basis for Armstrong's request with respect
27 to Robert Armstrong, his father, is that Mr. Armstrong is
28 elderly and in poor health. My client is willing to

1 accommodate Mr. Armstrong's needs, even to the extent of
2 taking Mr. Armstrong's testimony in his own home or where most
3 convenient to him, and to allowing breaks as necessary.
4 Armstrong's own prior testimony indicates that he experienced
5 upsets with his father, with the two of them literally
6 engaging in physical battles and resulting in his father and
7 mother sending Armstrong to a psychiatrist for treatment. Mr.
8 Armstrong's testimony concerning his son's attitudes, behavior,
9 emotional states, and statements or admissions both prior to
10 and during Scientology are vital to Armstrong's damages
11 claims. Dr. Newcombe's letter simply says that Mr. Armstrong
12 is an elderly man who is debilitated and has some physical
13 ailments and feels it is "unlikely" he could give a meaningful
14 deposition. Ill and injured people give depositions all the
15 time and unless he is mentally incapable, we are entitled to
16 his deposition within his physical limitations. No one else
17 has the knowledge available to Mr. Armstrong as Cross-
18 Complainant's father, and it would be highly prejudicial to
19 deny the Church the right to defend itself by obtaining this
20 evidence.

21 8. Armstrong's Opposition also claims that the
22 depositions of Leonard Howe and Rodney Antrobus are "part of a
23 'fishing expedition'", and seeks denial of those depositions
24 as irrelevant. Howe and Antrobus were both Armstrong's
25 friends in the mid- to late-1960's, the period just prior to
26 Armstrong's entry into Scientology. Their involvement with
27 Armstrong during these years, when he engaged in acts such as
28 auto theft, breaking and entering, illegal drug use, and

1 public intoxication, is vital not only to Armstrong's damages
2 claims but also to his credibility as a witness in the present,
3 particularly where Armstrong has denied some of these actions
4 under oath in Church-related litigation. Armstrong complains
5 that their knowledge and information is over 20 years old.
6 This Court had no difficulty in making value judgments and
7 allowing Armstrong to testify concerning Mr. Hubbard based on
8 Armstrong's interpretations of events which occurred as much
9 as sixty years ago. Justice demands that the jury in this
10 case be allowed to form its judgment based on evidence given
11 by witnesses with personal knowledge such as Howe and
12 Antrobus. Beverly Hills Natl. Bank v. Superior Court (1961)
13 195 Cal.App.2d 861, 865, held that: "A denial of the taking
14 of a deposition at all is, of course, the ultimate in
15 protective orders. In view of the unlimited right of
16 discovery . . . situations will seldom arise where an order
17 that the deposition shall not be taken will be appropriate.
18 Such an order may not be made except for 'good cause' and a
19 strong showing is required before a party will be denied
20 entirely the right to take a deposition."

21 9. Gerald Armstrong has filed an eleven page, rambling
22 "declaration" supposedly to point out that his "B-1" file that
23 was produced was incomplete. He addresses this point only
24 sporadically. In the rest of the "declaration" he appears to
25 be trying to bolster his meritless cross-complaint and impress
26 this Court with his complete psychotic breakdown and wild
27 unsupported paranoia.

28 10. Gerald Armstrong was never in the Information Bureau

1 of the Guardian's Office. He does not know what was contained
2 in "B-1" files and he does not know what was, is or should be
3 in his "B-1" file. He is claiming that the Church, its
4 attorneys and private investigators are doing things to him,
5 that documents must exist to support these wild claims and
6 therefore, that these purported documents are in his "B-1"
7 file.

8 11. The declarant should state facts upon which he bases
9 his claim that these purported documents are or should be in
10 his "B-1" file. He states no facts but only his speculations.
11 It is clear that neither Gerald Armstrong nor this Court can
12 order Cross-Defendant to produce documents that do not exist
13 and documents that are not in the "B-1" file.

14 12. Gerald Armstrong's "Declaration" is a transparent
15 attempt to poison an already biased court with his irrelevant
16 accusations and claims regarding Cross-Defendant. In this
17 declaration about his "B-1" file, Armstrong rants and rambles
18 on about the Christofferson case, Church of Scientology of
19 California's financial condition from the Wollersheim case,
20 the Paulette Cooper case, Op Freakout, Juggernaut, "a paid-off
21 dirty cop", "a bevy of PIs", graphologists and ASI, RTC, OSA
22 (US and Int), CMO and WDC. After twaddling on with all of
23 this irrelevant unsupported jibberish for page after page,
24 trying to demonstrate to this Court that he is totally mad;
25 he takes that final step into the "Twilight Zone" when he
26 claims: "it [the Church] raised me in importance to its
27 number one or two enemy." This illusion of grandeur is as
28 ridiculous as his claims.

1 13. Gerry Armstrong was a low level file clerk assigned
2 to file, and to put documents together for transmission to Omar
3 Garrison. Being unable to handle that simple job, he crawled
4 away in 1981. He did not gain importance, but notoriety
5 because he stole documents that had been entrusted to his
6 care. No one cared that he left the Church or cared if they
7 ever heard from or saw him since he had failed at every job he
8 had while in the Church. The attention he was given after he
9 left was only because he had in his possession the documents
10 he stole. The Church never directed any activities or actions
11 toward Armstrong but only towards locating its documents.
12 Once the documents were located and returned to the court the
13 private investigators stopped their legal peaceful
14 surveillance; however, it appears Armstrong's paranoia has
15 never stopped. Armstrong dreams up all of these "operations"
16 and international intrigue because he feels secure that this
17 Court's prejudice against Scientology will allow him to make
18 any outrageous unsupported claim and it will be believed.
19 After all, it worked once. This Court found that it was okay
20 to steal private confidential documents and use them in an \$80
21 million cross-complaint if Armstrong "thought" that Cross-
22 Defendant might sue or attack him.

23 14. Armstrong and his counsel for over a year have told
24 this Court that they needed his preclear folders and his "B-1"
25 file to show that the Church took confidential embarrassing
26 material from the preclear folders and used it against him.
27 After all, this was supposed to be an issue in this case. Yet
28 in Armstrong's "Declaration" he does not mention anything

1 about preclear folder "culling" or how the information may
2 have been divulged. Now is the time for this Court to
3 realize that the Church never divulged confidential
4 preclear folder data about Armstrong outside the
5 ecclesiastical structure—and it was never used against him.
6 Instead the Church has pursued every legal avenue to protect
7 the confidentiality of the preclear folder data. Armstrong
8 is not interested in pursuing the claims pled in this case,
9 but in using the Court to help in his psychotic vendetta to
10 destroy the Church and boost his ego as Church public "enemy
11 number one" (or two).

12 15. It is time that this Court recognizes what Armstrong
13 is trying to do. If this Court is to maintain any semblance of
14 integrity and justice this foolishness must stop. To allow it
15 to continue only shows improper judicial involvement. This
16 "declaration" was supposed to be a statement telling factually
17 why Armstrong had knowledge that his "B-1" file may have been
18 incomplete. Nowhere does Armstrong discuss facts or the
19 factual basis for his knowledge, but spews poison like a crazed
20 viper. His attorney should not have allowed this thing called
21 a "declaration" to be filed with the Court and should be
22 sanctioned under C.C.P. § 128.5.

23 16. This matter is simple. Cross-Defendant has complied
24 with C.C.P. § 2031 by producing all Guardian's Office files
25 pertaining to Gerald Armstrong. The extent of the search and

26 / / /
27 / / /
28 / / /

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF

I have read the foregoing _____ and know its contents.

CHECK APPLICABLE PARAGRAPH

I am a party to this action. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am an Officer a partner a of

a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I have read the foregoing document and know its contents. The matters stated in it are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for _____

a party to this action. Such party is absent from the county of aforesaid where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I have read the foregoing document and know its contents. I am informed and believe and on that ground allege that the matters stated in it are true.

Executed on _____, 19____, at _____ California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Signature

ACKNOWLEDGMENT OF RECEIPT OF DOCUMENT (other than summons and complaint)

Received copy of document described as _____

on _____ 19____

Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF

I am employed in the county of Los Angeles State of California.

I am over the age of 18 and not a party to the within action; my business address is: 8530 Wilshire Blvd. Suite 407

BEVERLY HILLS, CA. 90211

On OCTOBER 20 19 86 I served the foregoing document described as _____

DECLARATION OF JOHN G. PETERSON

on ALL PARTIES

in this action by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States mail at _____

addressed as follows:

SEE ATTACHED LIST

(BY MAIL) I caused such envelope with postage thereon fully prepaid to be placed in the United States mail. Executed on _____, 19____, at _____, California.

(BY PERSONAL SERVICE) I caused such envelope to be delivered by hand to the offices of the addressee. Executed on OCTOBER 20 19 86, at LOS ANGELES, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

SEA ORGANIZATION

BASE PERSONNEL ORDER 1R-2

11 November 1975

BASE PERSONNEL LIST

<u>NAME</u>	<u>POST</u>	<u>ROOM NUMBER</u>	<u>CASE & TRNG LEVELS</u>
Cmdr Tony Dunleavy †	Commanding Officer	205 Neptune	OTVII OBC CL VI
Cmdr Hana Eltringham NR	Supercargo	513 Neptune	OTVII OBC CL VII
Ens Gwen North †	Chief Officer	614 Neptune	OTIII SSII CL VIII
CPO Bonnie Meadows †	FCCI Prod Off	318 Neptune	OTIIIX FEBC HDG
CPO Mike Rubio CNM/N	FCCI Org Off	608 Neptune	OT IV OBC FEBC
ANN HALLBLUM NOL	FBO.		
<u>OFFICE OF LRH</u>			
Lt. Cmdr Ken Urquhart †	LRH Pers Comm	205 Neptune	IIIX, VII SSII O-The
Ens Joyce Popham NOL	LRH Pers Comm Sec	412 Sea Dip	VA SSII HAS
*W/O Rick Merwin NOL	CS-7/LRH Comm Base	306 Neptune	IIIX SROEC CLIV XDN
Mam Ron Strauss NR	Ests Pgms Off USB Est	130 Neptune	OTVII DSEC HDC HDG
Mam Alethea Taylor NR	LRH Pers Sec	308 Neptune	OT II SS II
Cliff Von Shura NR	LRH Pers Sec Comm	232 Neptune	OT IV SSII CL VI XDA
Pat Brice NR	LRH Comps I/C	214 Neptune	OTIII SSII CL VII
Ernie Ryan NR	LRH Comps Asst	220 Sea Dip	GR VI SSII DN AUD
Andre Clavel NR	LRH Artist	406 Sea Dip	GRIV DRDX SSII CLIV
W/O Arthur Hubbard NR	Asst LRH Artist	108 Neptune	VA SSII
W/O Bill Broderick NOL	T/LRH AV	520 Sea Dip	IIIX SSIX PRD HDC
Cathy Cariotaki CNM/N	D/CO HU	(O N M I S S I O N)	
Vicki Berman NOL	MSH Steward	105 Neptune	VA OEC
Tracy Holmes NOL	Asst MSH Steward	105 Neptune	GR IX SSII HSDC
Maudie Dorr NOL	FMO 1234	429 Sea Dip	OTIII SSII CLVI
WALLY BURGESS	LRH INTERNAL PR	417 NEPT	OTIII, SSII, CLIII
<u>DEPT 21 - ESTATES BRANCH</u>			
W/O Loy Young	CO Ests/CO LRH PSO	121 Neptune	OTVII SROEC CLX XDN
Lt. Cmdr Bob Young	Estates Prod Off	121 Neptune	OTIII OEC CL O
Frank McCall	Estates Org Off	607 Neptune	OTVII OEC HSDC CLVI
<u>Estates Planning Preps & Inspections Section</u>			
W/O Richard Allcock	PPI Chief	(O N M I S S I O N)	
Mam Nats Markowitz	T/PPI Chief	114 Neptune	VA SSII HQS
<u>Domestic Services Section</u>			
W/O John Allcock	Dom Services Ch	524 Sea Dip	OTVI SSII
Pam Charlton	Ch Housekeeper (on loan from Off of LRH)	522 Sea Dip	GR IV SSII
CPO Tom Lynch	Housecleaning I/C	608 Neptune	OT II
IO Max Goodman	Heads Cleaner I/C	126 Neptune	OTIII SSII HDC CL I
IO Henry Lubbe	Laundry I/C	502 Neptune	OTV SSII CL IV
IO Jeanette Allcock	Room Cleaner I/C	524 Sea Dip	VA SSII

C.

<u>NAME</u>	<u>POST</u>	<u>ROOM NUMBER</u>	<u>CASE & TRNG LEVELS</u>
Jim Pettigrew	Room Cleaner	220 Sea Dip	GR O SS II
Jerry Rice	Room Cleaner	409 Sea Dip	GR IV SS I
<u>Food Services Section</u>			
Mick Davies	Chief Steward	228 Neptune	GR III SS II
Gene Juss	Chief Cook	228 Neptune	GR IV SS I
Jim Wavell	1st Cook	228 Neptune	GR O CL I
Ines Park	2nd Cook	424 Sea Dip	Dn SSII HSDC
(On Loan from Office of LRH)			
Chris Heppen	Food Preps	316 Sea Dip	GR IV SSI HSDC
Sven Petersen	Menu Planner	234 Neptune	OTII SSII CLIII
Patrice Andreu	FCCI Steward	114 Neptune	S/W SS II
Tom Ritter	Steward	532 Sea Dip	CCHs SSII HAS
Paco Suarez	FCCI Steward	231 Neptune	GR O SS II MCSC
Abdel Rebbaj	Steward	326 Sea Dip	DRD
AB Bob Prior	Steward	234 Neptune	VA SSII CLIII
Konni Frazier	Hygiene I/C	316 Sea Dip	GR IV SS II
Ralph Hilton	Steward	234 Neptune	OT III SS I
Pat Broeker	Dishwasher	508 Neptune	OTVII SSII HDG
Kevin Campbell	Dishwasher	532 Sea Dip	Obj SSII HAS
<u>Buildings & Grounds Service Section</u>			
Lt Karl Rosenkrans	Bldgs & Grnds Ser Ch	430 Sea Dip	OTVI SS II CL IV
Sheldon Mousell	Bldgs & Grnds Maint	128 Neptune	GR IX SSII MCSC
Colin Freeman	NSR Off	128 Neptune	OTIX SSII HDG
David Gilliam	Chief Electrician	128 Neptune	VA SSI I HDG
<u>Motor Pool Section</u>			
MsM Warwick Allcock	Motor Pool I/C	231 Neptune	OTIIIX SSII HDG
Wayne Marple	Ext Comm Driver	(O N	M I S S I O N)
W/O Bert Rossouw	Driver	203 Sea Dip	OTIIIX SSII HSDC
Tom DuFour	Mechanic/Driver	231 Neptune	GR IVX SSII HQS
<u>COMMODORE'S MESSENGERS</u>			
Ens Terri Armstrong	CO CMO	102 Neptune	VA SSII PRD
David Rossouw	Sect 2 I/C	232 Neptune	VA SSII
Rachel Hall	Coll Off	103 Sea Dip	Dn CC SSII Vol 0
W/O Diana Reisdorf	S/C CMO	608 Neptune	Gr IVX SSII
W/O Clarisse Barnett	Treas Sec	127 Neptune	Gr IV SSII
Karen Filipi	Qual Sec	103 Sea Dip	GR3 EXP ARCSW SSII M
Trudy Broeker	HAS CMO	508 Neptune	VA SSII
Ens Janis Gillham	Dir I&R/MAA	236 Neptune	VA DRDX SSII PRD
Ens Claire Mauerer	Sect 3 I/C	236 Neptune	OTVII SSIII CLIII
W/O Jill Goodman	Tech Sec	127 Neptune	OTVII SSII CLIV I
Ens Anne Rush	Chief Officer SMO	129 Neptune	VA SSII PRD
Jo Albert	Div 4 Exp	435 Sea Dip	OTV SSII PRD CLIV HDG

<u>NAME</u>	<u>POST</u>	<u>ROOM NUMBER</u>	<u>CASE & TRNG LEVEL</u>
<u>Cadets</u>			
Lisa Caetano	Dir Pers	229 Neptune	SSII Inv Tech
Julie Caetano	CO Comm	229 Neptune	Obj SSII
Lois Jory	Div 2 Sec	127 Neptune	GRIIIX SSII PRD InvTe
Valerie Schomer	Dir Comm	435 Sea Dip	GR IV SSI
Tanja Burden	Dist Sec	127 Neptune	DRD SSIII HAS
Marc Yager	OIC I/C	232 Neptune	GRIV SSIII
Michelle Barnett	LRH Comm	236 Neptune	DRD ARCSW SSII
Barbara Dutton	D/Treas Sec	229 Neptune	DRD SSIII InvTech PRD

PSO

AB Karen Rossouw	Uniform Maint.	314 Neptune	GRIV SSII
Rick Siegal	Aud PSO	311 Sea Dip	VA XDN CLIV SSII
Ron Mitcheson	Costumes Asst	231 Neptune	OTVII SSII CLIV
Aian Vos	Costumes I/C/D CO PSO	231 Neptune	GRIVX SSIII HQS
Jordan Saxton	Set Contr.	407 Sea Dip	GR0 XDN SSII HQS
Janet Thompson	Make up	429 Sea Dip	GRIV SSII CLIV
Pam Teggatz	Small Props	607 Neptune	VA SSII
Don Rowley	LRH Comm PSO	405 Sea Dip	OTVI SSIV CLVIII

GUARDIANS OFFICE

Lt Nikki Herwin	CS-G Comm	306 Neptune	OTVI SSII HDG
Rosemary Broderick	CS-G Transcriber	520 Sea Dip	GR 0 SSII DSEC HDG
Msm Lola Rossouw	AG/AGF	203 Sea Dip	OT3 SSII M1 HSDC CLV
Virginia Cartmell	AG I	404 Sea Dip	GR IX SSII
Phillip Park	Legal	424 Sea Dip	DRD SSII Level 0
Lt Vicki Livingston	LRH Accts	206 Sea Dip	OT3 OEC HDC CL I
W/O Gerry Armstrong	Dir Br I	102 Neptune	GR IV
Anne Burgess	AG Legal	214 Neptune	OTIIX CL 0
Janice Mead	On Men assisting AG Legal	603 Neptune	OTIII SSII

HCO DIVISION ONE

Msm Sam Licciardi	HAS	417 SD	OT VII, FEBC, OEC, HSDC
PO Marien Witcher	Dir Personnel	429 SD	GR IV, EXP GR 1, PRI DRD, SS IV, DSEC.
PO Yvonne Press	Dir Comm	230 Nept	SS II, HPCSC,
Chuck Adams	Ext Comm Chief	305 Nept	GR I, SS II
Clint Beseau	D/Ext Comm Chf. Frt/ Transport	307 Nept	Obj, SS I
Wayne Portice	Mail In/Out Comm Runner	224 SD	Da, ARC SW, DRD, SS II
Mike Rinder	Telex Op	307 Nept	Integ Proc, SS II
Charyl Chopping	Receptionist	526 SD	VA, SS II, HDA, CL III
Terry Slade	Dir I and R	126 Nept	Gr IV, SS II
Don Jennings	D/Dir I and R	112 SD	OT V, HEJSC, OEC, CL VI
John McGinley	Matting Off (Part Time)	225 SD	OT VII, SsrOEC
Bob Visk	Recruit Msnre	226 SD	DRD, SS I, HQS
Lynn Visk	Recruit Msnre	226 SD	OT VII, SS II, HDG
<u>EXPEDITOR POOL:</u>			
Nick Stark	Expediter/TTC when complete	420 SD	GR IVX, SS I, STD HAT
Bonnie Gerda	Expediting Div II	520 SD	Life Repair, HSDC
Polly Lewis	Expediting in Mines	219 SD	ARC SW
<u>DISSEM DIV TWO:</u>			
Lt Cndr Robin Roos	Dissem Sec	130 Nept	SS II OT VII
CPO Roy McMurray	Dir Promo	602 Nept	VA, SS II
WO Sue Rebbaj	Dir Reg	326 SD	VA, SSII, HDG
David Richards	Sr Body Reg (on msn)	428 SD	VA, SSII
Ens. Dave Foster	Body Reg	409 SD	OT III, OEC, CL IV
PO Hugh Harrison	FSC INT (on msn)	234 Nept	OT III, SS II, DSE
Mary Ziff	Letter Reg	226 SD	VA, SS II
PO Gabi Lim	Letter Reg	329 SD	LR, SS II
CPO BrainCharlton	ASR	522 SD	MIIX, OEC, HDA
Bob Howson	CF I/C	324 SD	GR IV, SS I
Jorge Pedrosa	CF ASSNT	229 SD	SS II, HSDC
Peter Vogeding	Addresso	322 SD	VA, SS II

ADVANCE UNIT:

Ens David Ziff	Advance Editor	226 SD	OT VII, OEC, FEBC, CL VI
W/O Annie McGinley	Typesetter	411 SD	OT IIIIX, OEC, SNR OEC, HSDC
Jeff Hawkins	Makeup/Design	403 SD	VA, FEBC

TREASURY DIVISION THREE:

Msn Louise Shekter	Treas Sec	506 Nept	VA, SS III
BILL RYAN Linda Vogeding	D/TREAS SEC Dir Income	322 SD	OT IIIIX, SSII, PRD
Arlens Richards	Cashier (on msn)	428 SD	
David Portise	Coll Off	224 SD	Exp SW, OEC
W/O Peter Gillham	Dir Disbursements	206 Nept	OT IIIIX, SS III, PRD, MCSC, HDA
Marge Clark	Statements/Billings Off	228 SD	VA, SSII
Gary Pollack	Accts Letter Reg	224 SD	SW, SS II
George Beasley	Purchaser	328 SD	GR IV, SS II, HDG, CL IV PROV.
Steve Cartmell	Dir RAM/ ^{Payroll} Purchaser	434 SD	Gr I, HSDC
Honer Shomer	Treas Pjt	406 SD	OT I, OEC EL III
Andy Yarkow	Food Purchaser	126 Nept	— — —

DIVISION FOUR:

PORT C PO John Ausley	Tech Sec	106 Nept	OT VII, SSII, CL I
STBD ^{BUCHHEIM} Asst Annabelle Ryan	Tech O/O	614 Nept	GR IV, SS III, HDG
PORT Asst Sandy Ferriera	DTS	403 SD	VA, SS II
STBD Foster Tompkins	Call In Officer	On Man	
STBD ^{MSLY} Lenny Complanan	Tech Page	232 Nept	Gr IV, SS II, HSDC
STBD PO Maxine Cochran	D of T ^{Page}	230 Nept	GRVI, SS II, HSDC,
PORT Craig Ferriera	Admin Courses Super	403 SD	GR IVX, SS II, TR CRSE SUPER CRS
AL LAMBERTI	TECH CRSES SUPER		
STBD Chuck Murray	Tech Courses Super	208 SD	GR V, OEC, HDC
Charlie Rush	Admin Course Super	129 Nept	GR IVX, SS II HDA
STBD Vinay Agawalla	ADMIN Word Clearer HCI	229 SD	MI OBJ, SS II, W/C
PORT Sns Des Pophan	TECH Word Clearer HCI	412 SD	OEC, CL O
Russ Barragan	Course Admin	405 SD	DN, SS II
PORT John Hansen	D of P	417 Nept	OT VI, SS II, XDN AUD
STBD Elena Rosenkranz	HGC Admin	430 SD	SS II, HAS
PORT Eric Johnson	Folder Admin	311 SD	MI, SSII, CL IV
PORT Rick Cohen	CADRE TUTOR/HGC AUDITOR	302 NEPT	CLAR SSII CIVL DN

STBD	Mrs Grace Campleman	FESer	411 SD	OT VII, SS III, CL V
	Elen Samuels	T/FESer	207 SD	OT VII, CL IV, SS II
	MAUDE DORR	FESer (when mission complete)		
STBD	Eridget Warple	T/FESer	209 SD	OT IIIIX, SS II, CL XI
PORT	Meredith Thomas	FESer	209 Nept	OT IIIIX, SS II, CL VIII DN C/S

AUDITORS:

SECTION A:

PORT	Mrs Karen De La Carriere		308 Nept	OT 7, SS II CL XII
PORT	Lt Quentin Hubbard		108 Nept	OT 7, OEC, CL XII
STBD	W/O Alex Gerber		108 Nept	OT 7, OEC, CL XII
STBD	Mrs Linda Shafran		208 Nept	OT 3, SS II, CL VI, XDN
PORT	Mrs Lisa Gerber		308 Nept	OT 7, OEC, CL 8, XDN
PORT	John Eastment		222 SD	OT 3X, OEC, DSEC, CL XII

SECTION B:

STBD	PO Penny Murrery		208 SD	OT 3, SS II, CL IV, XDN
STBD	Jed Goldberg		212 SD	SS II, CL IV, HGDS
STBD	PO Maira Jose Sprangers		308 Nept	OT 3X, HDC
PORT	PO Sylvia Race		314 Nept	OT 4, SSII, CL IV, HCSC

SECTION C:

STBD	Lynne Fontaine		209 SD	GR VA, SS II CL IV, XDN
STBD	Glenn Samuels		229 SD	GR IVX, SS II CL VI
	Al Lamberti	TECH CRSES SUPER	407 SD	OT III, OEC, CL IV P
PORT	PO Janice Saxton			

SECTION D:

STBD	Richard Kennedy		603 Nept	OT 7, SS II, CL IV
PORT	Mrs Mark Shekter		506 Nept	GR I, SSI, HDC
PORT	Andrea Lewis		504 SD	OT 3X, SS II CL 8
STBD	PO Jan Morris		212 SD	SS II, CL IV
PORT	Jeff Johnson		207 SD	DRD, SS II CL IV
STBD	Denise McGahee		104 Nept	OT 3, SS II VOL 0 CL IV, HDC
STBD	Amos Jessup	TTC	417 Nept	OT 3, SS IV, CL IV

CASE SUPERVISORS:

STBD	Lt. David Mayo	Smr C/S	606 Nept	OT 7, OEC, CL XII
PORT	WD Robin Lindsell	Solo/Grades CS	602 Nept	OT 3, SS II, CL XIIC, CL 8 AUD
STBD	Mrs Russ Meadows	XDN/DN CS	313 Nept	OT 3, SS VI, CL XII

PORT	Msm Paulette Ausley	CS IT	106	Nept	OT 7, SS II, CL XII
STBD	W/O Merrill Mayo	CS IT	606	Nept	OT 3, OEC, CL XII
STBD	Ron Norton	CS IT	207	Nept	ARCSW, EXP., CL IV SS II
	^{ENTS.}				
STBD	W/O Ron Shafran	CS IT	208	Nept	OT 7, OEC, CL XII
STBD	Msm Sheryl Licciardi	CS IT	417	SD	OT 2, SS II, CL IV HGDS, HPCS

TTC:

	Geri Lee		422	SD	LR, SSII HSDC
	Bill Lee		422	SD	LR, SS II, HSDC
	Evan Hunt		312	SD	LR, SS II, HSDC
	Jers Lull		517	SD	ARCSW, SS II, PRD CL IV PROV, HSDC
	Jin Orloff		420	SD	LR, SS II, CL IV, Prov, Dn. Int
S	Cass Cron		219	SD	GR IV, SS III, EN CL 0
	Cregg Harrison		420	SD	DRD, LR, SS II HSDC
P	Lee Johnson		126	SD	HSDC, GR I, SS II, CL I
S	Glen Poole		311	SD	GR 0, SS II, CL IV PROV
S	Steve Irwin		517	SD	LR, SS II HSDC
P	Liete Halders		530	SD	LR, DRD, SS II
P	Peggy Eastment	Adv Crses Dir	222	SD	OT 3, SS II, CL III HDG

DIVISION FIVE

	W/O Judy Thiery	Qual Sec	614	Nept	OT 7, SS IV, CLVIII
	Emily Becker	Dir Val/Examiner	230	Nept	OT 7, SS II, CL III
	Murray Chopping	Review Auditor	526	SD	OT 7, SS III, CL VI CL VII
PO	Net Saunderson	DPE/MO (on loan from Office of LRH)	514	SD	GR IV, SS II CL 0
	Lt Cmdr Brian Livingston	Interne Super	206	SD	OT V, OEC, CL XII
	Lt Jeff Walker	Tech Cranning	417	Nept	OT 3, CL XII, SS II
	Scott Stratman	Word Clearer	312	SD	GR IV, SSII WCers C

DIVISION SIX

	CPO John Aozel	Dist Sec	312	SD	R6EW, SS II, HDG
	T'Shura Beasley	Dir Clearing	328	SD	OT II, SS II CL II

Fred Harris
Mike McCahee
Jim Diana

Tours
Tours
Tours

104 Nept
532 SD

on tour
ARCSW, SS II
D&D, SS II, WCers Gr

PO Marion Mitcher
for
HAS BASE
for
SUPERCARGO BASE
Approved by
IRH COSEN BASE
for the
BOARDS OF DIRECTORS
of the
CHURCHES OF SCIENTOLOGY

BDSC:RM:HE:SL:MW:yp:at

1 JOHN G. PETERSON
2 PETERSON AND BRYNAN
3 8530 Wilshire Boulevard, Suite 407
4 Beverly Hills, California 90211
5 (213) 659-9965

6 Attorneys for Plaintiff and Cross-Defendant
7 CHURCH OF SCIENTOLOGY OF CALIFORNIA

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

10	CHURCH OF SCIENTOLOGY OF)	Case No. C 420 153
	CALIFORNIA, a California)	
11	Corporation,)	(Severed Action)
)	
12	Plaintiff,)	REQUESTS FOR ADMISSION
)	PROPOUNDED TO CROSS-
13	v.)	COMPLAINANT GERALD ARMSTRONG
)	BY CROSS-DEFENDANT CHURCH OF
14	GERALD ARMSTRONG, et al.,)	SCIENTOLOGY OF CALIFORNIA
)	
15	Defendants.)	
16	_____)	
)	
17	AND RELATED CROSS-ACTION.)	
	_____)	

18
19 TO CROSS-COMPLAINANT GERALD ARMSTRONG AND TO HIS ATTORNEY
20 OF RECORD:

21 PLEASE TAKE NOTICE that Cross-Defendant CHURCH OF
22 SCIENTOLOGY OF CALIFORNIA hereby requests that Cross-
23 Complainant GERALD ARMSTRONG admit, pursuant to Code of Civil
24 Procedure, Section 2033, the truth of each of the following
25 matters of fact within thirty (30) days after the date of
26 service of this request.

1 REQUEST FOR ADMISSIONS

2 REQUEST FOR ADMISSION NO. 1:

3 Admit that your June 8, 1982 letter to John Peterson (a
4 copy of which is attached hereto as Exhibit "A") is not
5 completely true and accurate.

6 REQUEST FOR ADMISSION NO. 2:

7 Admit that after you left the Church of Scientology on
8 December 12, 1981, you attended one or more EST seminars.

9 REQUEST FOR ADMISSION NO. 3:

10 Admit that you dropped out of High School and also college
11 before you ever joined the Church of Scientology or took any
12 Scientology courses or read any Scientology literature.

13 REQUEST FOR ADMISSION NO. 4:

14 Admit that you had no personal or written contact with L.
15 Ron Hubbard after March 1, 1980.

16 REQUEST FOR ADMISSION NO. 5

17 Admit that you participated in a project or "mission" in
18 October of 1974, in which one of the objects or "targets" was
19 to place disclaimer warnings in Scientology books to the effect
20 that Scientology is an applied religious philosophy that does
21 not cure medical illnesses.

22 REQUEST FOR ADMISSION NO. 6:

23 Admit that auditing within the context of Scientology is a
24 spiritual process.

25 REQUEST FOR ADMISSION NO. 7:

26 Admit that in a deposition in the case of Van Schaick v.
27 Church of Scientology of California, et al., No. 79-2491-G,
28 on April 9, 1984, you stated under oath that the so called